

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JULIE ANNE STAMPS,)	
)	
Plaintiff,)	Case No. 3:21-cv-00746
)	
v.)	District Judge Trauger
)	
THE LAMPO GROUP, LLC,)	Jury Demand
)	
Defendant.)	

DEFENDANT’S MOTION TO EXTEND DEADLINES

Defendant, The Lampo Group, LLC, by and through the undersigned counsel, moves the Court to extend the Initial Disclosure deadline and the deadline for Defendant to respond to Plaintiff’s First Set of Interrogatories and Request for Production of Documents to May 31, 2022.

1. As Defendant advised the Court on February 28, 2022 (Doc. #20), Defendant and the Chapter 13 Trustee assigned to Plaintiff’s bankruptcy case, *In Re: Julie Anne Stamps*, Case No. 3:21-bk-02597, have tentatively resolved this case.
2. On February 25, 2022, the Chapter 13 Trustee moved the Bankruptcy Court to approve the parties’ settlement. A copy of this motion is attached as Exhibit 1.
3. Responses to the Chapter 13 Trustee’s motion were due by March 30, 2022. *See* Exhibit 1. From a review of the docket, none were filed.
4. Although no responses were filed, the Bankruptcy Court set the Chapter 13 Trustee’s motion for hearing on May 4, 2022. A copy of this notice of hearing is attached as Exhibit 2.
5. Today, April 29, 2022, is the parties’ deadline to exchange Initial Disclosures and

Defendant's deadline to respond to Plaintiff's First Set of Interrogatories and Request for Production of Documents. (Doc. #21).

6. Given the tentative settlement of this case and upcoming hearing on May 4, 2022, Defendant would like to extend these deadlines to prevent the parties from incurring unnecessary expenses.
7. This extension will not directly impact any other deadlines in this case. The parties' deadline for motions to amend or add parties is May 6, 2022. (Doc. #14). However, if the Bankruptcy Court does not approve the settlement, Defendant will not oppose a reasonable extension to that or any other deadlines in the Initial Case Management Order requested by Plaintiff or the Chapter 13 Trustee as her successor-in-interest.
8. If this case has not been fully resolved by May 31, 2022, Defendant will file a notice with the Court regarding the status of its settlement efforts with the Chapter 13 Trustee.
9. Defendant forwarded a copy of this motion to Plaintiff's counsel of record this afternoon but does not yet know whether she opposes it. However, given that the Chapter 13 Trustee has asserted ownership and control over Plaintiff's claims in this case, Defendant does not believe that she or her attorneys have any authority to act in this case anyway. *See, e.g., Auday v. Wet Seal Retail, Inc.*, 698 F.3d 902, 904-05 (6th Cir. 2012).

Therefore, Defendant moves the Court to extend the parties' Initial Disclosure deadline and the deadline for Defendant to respond to Plaintiff's First Set of Interrogatories and Request for Production of Documents to May 31, 2022.

Respectfully submitted,

/s/Leslie Sanders

Leslie Sanders (TN #18973)

Daniel Crowell (TN #31485)

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that, on April 29, 2022, I filed *Defendant's Motion to Extend Deadlines* via the Court's electronic filing system, which will automatically notify and send a copy of that filing to:

Heather Moore Collins
Ashley Shoemaker Walter
Caroline Drinnon
HMC Civil Rights Law, PLLC

Anne Hunter
Hunter Law Firm

Attorneys for Plaintiff

I further certify that, on April 29, 2022, I sent a copy of the foregoing, *Defendant's Motion to Extend Deadlines*, by e-mail to:

James M. Davis
jamesd@ch13bna.com

Attorney for Chapter 13 Trustee

/s/Daniel Crowell
Daniel Crowell (TN #31485)
Attorney for Defendant